

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JAMES R. HAUSMAN,

Plaintiff,

v.

HOLLAND AMERICA LINE-U.S.A.,
a Washington corporation; HOLLAND
AMERICA LINE, INC., a Washington
corporation; HOLLAND AMERICA LINE
N.V., a Curacao corporation; and HAL
ANTILLEN N.V., a Curacao corporation.

Defendants.

No. 2:13-cv-00937-BJR

**DECLARATION OF LOUIS SHIELDS &
EXHIBITS 1-4 THERETO IN SUPPORT
OF DEFENDANTS' RENEWED
MOTION FOR JUDGMENT AS A
MATTER OF LAW, OR
ALTERNATIVELY, FOR NEW TRIAL
OR REMITTITUR AS TO PUNITIVE
DAMAGES**

NOTE ON MOTION CALENDAR:
Friday, November 20, 2015

I, Louis Shields, declare as follows:

1. I am an attorney representing the Defendants in this action, am over the age of 18, and make the following statements based on my personal knowledge and business records maintained and relied upon in the regular course of business. If called as a witness, I could and would competently testify to the following:

SHIELDS DECL. & EXHS. 1-4 IN SUPPORT OF DEFENDANTS' RENEWED
MOTION FOR JUDGMENT AS A MATTER OF LAW, OR ALTERNATIVELY,
FOR NEW TRIAL OR REMITTITUR AS TO PUNITIVE DAMAGES
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1 2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiff's Trial Brief
2
3 Regarding Propriety of Instructing Jury on Alleged Maximum Ratio of Punitive Damages to
4 Compensatory Damage, which are kept and relied upon in the regular course of my business.
5 This brief was provided to us by Plaintiff's counsel in meeting and conferring during trial on the
6 issue of whether the jury should be instructed on the accepted 1:1 ratio in general maritime law
7 for punitive to compensatory damages.

8 3. Attached hereto as **Exhibit 2** are true and correct copies of excerpts of the
9 Verbatim Report of Proceedings in the above-referenced matter as to
10 a. Trial Day 1 (October 19, 2015);
11 b. Trial Day 4 (October 22, 2015);
12 c. Trial Day 5 (October 23, 2015); and
13 d. Trial Day 6 (October 26, 2015).

14 4. Attached hereto as **Exhibit 3** is a true and correct copy of part of Plaintiff's
15 Seventh Supplemental Disclosures in this case relating to Plaintiff's disclosure of \$106,521,96
16 in past medical expenses.

17 5. Attached hereto as **Exhibit 4** is a true and correct copy of Plaintiff's Trial Exhibit
18 P-1, containing various post-incident reports on various HAL vessels.

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct to the best of my knowledge and belief.

21 Executed this 5th day of November, 2015 at Seattle, Washington.



22 23 LOUIS SHIELDS

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Herbert Farber, Esq.
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I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed at Seattle, Washington.

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